

Todd L. Bice, Esq., Bar No. 4534

TLB@pisanellibice.com

Dustun H. Holmes, Esq., Bar No. 12776

DHH@pisanellibice.com

Robert A. Ryan, Esq., Bar No. 12084

RR@pisanellibice.com

PISANELLI BICE PLLC

400 South 7th Street, Suite 300

Las Vegas, Nevada 89101

Telephone: 702.214.2100

Facsimile: 702.214.2100

Attorneys for Pioneer Hotel, Inc.,

Mandalay Resort Group, MGM Resorts International,

MSE Investments, Inc., Gold Strike Investments, Inc.,

Newcastle Corp., and Ramparts, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SIERRA DEVELOPMENT CO. d/b/a CLUB
CAL NEVA,

Plaintiff,

v.

CHARTWELL ADVISORY GROUP, LTD.

Defendant.

CHARTWELL ADVISORY GROUP, LTD.,

Counterclaim Plaintiff,

v.

SIERRA DEVELOPMENT CO., *et al.*,

Counterclaim Defendants.

CASE NO. 3:13-cv-00602-RTB-VPC

**STIPULATION AND ~~PROPOSED~~ ORDER
FOR EXTENSION TO FILE MOTION FOR
ATTORNEYS FEES AND COSTS AND TO
SUBMIT BILL OF COSTS**

Defendant/Counterclaimant Chartwell Advisory Group, LTD. ("Chartwell"), Counterclaim

Defendant Pioneer Hotel, Inc. ("Pioneer"); Counterclaim Defendants Mandalay Resort Group,

MGM Resorts International, MSE Investments, Inc., Gold Strike Investments, Inc., Newcastle

Corp. and Ramparts, Inc. (collectively, the "Mandalay Parties"); Counterclaim Defendants

Harrah's Las Vegas, LLC, Harrah's Laughlin, LLC and Rio Properties, LLC (collectively, the

“Harrah’s Parties” and together with Pioneer and the Mandalay Parties as “Counterclaim Defendants”), by and through their respective counsel, hereby Stipulate and Agree as Follows:

1. On July 6, 2018, this Court entered its Memorandum Decision following the Bench Trial in this case. [ECF No. 689]

2. That same day, the clerk of the Court entered Judgment in accordance with this Court’s Memorandum Decision. [ECF No. 690]

3. Based on these dates, any motions for attorneys’ fees and costs pursuant to Fed. R. Civ. P. 54(d) and/or requests for taxable costs under Local Rule 54-1 would be due within fourteen (14) days, or by **July 20, 2018**.

4. Following the entry of the Judgment, the Parties have been engaged in settlement discussions that the parties believe may alleviate the need to file motions for attorneys’ fees and costs and/or requests for taxable costs.

5. As such, the parties request a short two-week extension of time to file any motions for attorneys’ fees and costs under Fed. R. Civ. P. 54(d) and/or any requests for taxable costs under Local Rule 54-1, such that all such motions would be due on or before **August 3, 2018**.

6. The Parties request this extension in good faith and not for any dilatory motive.

DATED this 19th day of July 2018.

PISANELLI BICE PLLC

DILWORTH PAXSON LLP

By: /s/ Todd L. Bice
 Todd L. Bice, Esq., Bar No. 4534
 Dustun H. Holmes, Esq., Bar No. 12776
 Robert A. Ryan, Esq., Bar No. 12084
 400 South 7th Street, Suite 300
 Las Vegas, Nevada 89101

By: /s/ Joshua D. Wolson
 Joshua D. Wolson, Esq. (*pro hac vice*)
 1500 Market Street, Suite 3500E
 Philadelphia, PA 19102

*Attorneys for Counterclaim Defendants
 Mandalay Resort Group, MGM Resorts
 International, MSE Investments, Inc., Gold
 Strike Investments, Inc., Newcastle Corp., and
 Ramparts, Inc.*

Calvin R.X. Dunlap, Esq., Bar No. 2111
 Monique Laxalt, Esq., Bar No. 1969
 DUNLAP & LAXALT
 537 Ralston Street
 Reno, Nevada 89503

Attorneys for Chartwell Advisory Group, Ltd.

DICKINSON WRIGHT PLLC

By: /s/ Joel Z. Schwarz
Michael N. Feder, Esq., Bar No. 7332
Joel Z. Schwarz, Esq., Bar No. 9181
8363 West Sunset Road, Suite 200
Las Vegas, Nevada 89113

Attorneys for Caesars Entertainment Corporation, Harrah's Las Vegas, LLC, Harrah's Laughlin, LLC, Rio Properties, LLC, Golden Nugget, Inc., GNLV Corp., and Golden Nugget Hotels and Casinos

ORDER

Based upon the Stipulation of the Parties, and good cause appearing therefore, IT IS
HEREBY ORDERED:

The Deadline for the Parties to submit any motions for attorneys' fees and costs pursuant to Fed. R. Civ. P. 54(d) and/or any requests for costs pursuant to Local Rule 54-1 shall be extended from July 20, 2018 to **August 3, 2018**.

IT IS SO ORDERED.



U.S. DISTRICT COURT JUDGE

DATED: 7/27/2018